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December 3, 2009

## VIA OVERNIGHT MAIL

U.S. Environmental Protection Agency  
Attn: Evette Jones, Program Manager  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604

Re: Response to General Notice of Potential Liability for Removal Action at  
Former Rogers Cartage Facility Site in Cahokia, Illinois

Dear Ms. Jones:

I am writing on behalf of ConocoPhillips Pipe Line Company ("ConocoPhillips") in response to the General Notice of Potential Liability dated November 6, 2009, addressed to Rogers Cartage Corporation, Tankstar, Inc., and ConocoPhillips regarding delineation of PCB contamination at the former Rogers Cartage facility in Cahokia, Illinois.

As you may be aware, the former Rogers Cartage facility encompasses approximately five acres on the southernmost portion of a 360-acre pipeline terminal property now owned by ConocoPhillips. As reflected in the enclosed lease agreement, Rogers Cartage had exclusive possession of the five-acre tract and operated the facility for bulk chemical transportation and storage from May 1, 1960, through April 30, 1970. The former Rogers Cartage parcel has not been used or occupied since then.

We understand that Rogers Cartage washed PCB-containing trucks at the facility, storing wastewater generated from this process in large lagoons that have since been backfilled to grade. The highest concentrations of PCBs are in the presumed area of the former lagoons. Although there is no question that Rogers Cartage is the source of the contamination, Rogers Cartage previously refused to cooperate in performing or funding the necessary investigation. At its own expense, ConocoPhillips performed a Shallow Soil Investigation, a report of which was submitted to EPA in August 2008.

As the current owner of the property, ConocoPhillips is interested in proceeding with further discussions and negotiations regarding the path forward as soon as possible.

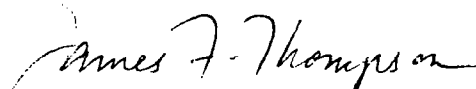
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Toward that end, ConocoPhillips sent the enclosed letter to Robert Schultz, counsel for Rogers Cartage, by facsimile and overnight mail on November 24, 2009. We have received no response to date.

Please contact me when you have heard from Rogers Cartage and/or Tankstar so that we can schedule a meeting to discuss the next steps. We would be happy to meet at USEPA's offices in Chicago if that is most convenient for you.

Sincerely,

LATHROP & GAGE LLP

By:   
James F. Thompson

Enclosures

cc: Thomas Martin, U.S. EPA Office of Regional Counsel (with encls.)